

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS,

and

AMERICAN FEDERATION OF
TEACHERS,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
JUSTICE, *et al.*,

Defendants.

Case No. 1:25-cv-02429-MKV

Declaration of Veena Dubal

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN ASSOCIATION OF UNIVERSITY
PROFESSORS,

and

AMERICAN FEDERATION OF TEACHERS,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF JUSTICE. et al.,

Defendants.

Case No.1:25-cv-02429-MKV

Declaration of Veena Dubal

I, Veena Dubal, declare as follows:

1. I currently serve as General Counsel for the American Association of University Professors (“AAUP”), one of the Plaintiffs in this case. I am licensed to practice law in California.
2. I am also a Professor of Law at University of California, Irvine.
3. I received a B.A. from Stanford University and J.D. and Ph.D. degrees from the University of California, Berkeley.
4. I received the documents attached to this declaration as Exhibit A from multiple AAUP members on the faculty at Columbia University who had grants frozen as part of Defendants’ termination of \$ 400 million in grant funding to Columbia.
5. It is my understanding that those members received these communications from the Columbia Office of the General Counsel on or around March 24, 2025.

6. It is my understanding that these members had not sought legal counsel from the Columbia Office of the General Counsel and did not understand themselves to have any sort of attorney-client relationship with that office.

7. Further, it is my understanding that the communications were received by many, if not all, faculty members who had grants terminated. The correspondence does not appear to be personalized to individual faculty members but instead is generally addressed to: “Dear Principal Investigators with terminated awards.”

8. These communications advised AAUP members that the government had identified certain “non-aligned” ideas and areas of research that might impact the ability of AAUP members to receive grants. The communications asked AAUP members to consider how they could rescope their federally-funded research to avoid topics and ideas that are “non-aligned” with the current federal administration. That members have been asked to avoid certain topics in research for political reasons presents a clear harm to academic freedom— and protecting academic freedom is AAUP’s core mission.

9. These communications suggest that Columbia understands the question of whether grant funding will resume to turn not on whether it cures any claimed violation of Title VI with respect to antisemitism, but on whether the research funded by the terminated grants can be revised to avoid “non-aligned” areas. The prospect of the government identifying—and Columbia accepting—areas of academic inquiry as off limits or non-aligned for purposes of scholarly research is particularly troubling to AAUP given its commitment to academic freedom.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: April 3, 2025

Signed: 

Veena Dubal
General Counsel, AAUP